

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: THOMAS TAYLOR PEARCE, : CHAPTER 13
AKA THOMAS T. PEARCE and :
JENNIFER MARIE PEARCE, FKA :
JENIFER MARIE MILLER, FKA :
JENIFER MARIE EMKEY, AKA :
JENIFER M. PEARCE, AKA :
JENIFER M. MILLER PEARCE, :
Debtors :
: :
JACK N. ZAHAROPOULOS, :
STANDING CHAPTER 13 TRUSTEE, :
Movant :
: :
vs. :
: :
THOMAS TAYLOR PEARCE, :
AKA THOMAS T. PEARCE and :
JENNIFER MARIE PEARCE, FKA :
JENIFER MARIE MILLER, FKA :
JENIFER MARIE EMKEY, AKA :
JENIFER M. PEARCE, AKA :
JENIFER M. MILLER PEARCE, :
Respondents : CASE NO. 1-24-bk-02059-HWV

TRUSTEE'S OBJECTION TO SECOND AMENDED CHAPTER 13 PLAN

AND NOW, this 31st day of March 2025, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, by and through his attorney Douglas R. Roeder, Esquire, and objects to the confirmation of the above-referenced Debtors' Plan for the following reason:

1. Debtors' Plan violates 11 U.S.C. §1325(a)(4) in that the value of property to be distributed under the Plan on account of each allowed unsecured claim is less than the amount that would be paid on such claim if the estate were liquidated under Chapter 7. More specifically, Debtors have access to non-exempt equity in the following:

- a. Residential real estate. Trustee requests proof of the value of the Debtors' home as stated in their schedules. More specifically, Trustee requests a copy of the listing agreement.

WHEREFORE, Trustee alleges and avers that Debtors' Plan cannot be confirmed, and therefore, Trustee prays that this Honorable Court will:

- a. deny confirmation of Debtors' Plan;
- b. dismiss or convert Debtors' case; and
- c. provide such other relief as is equitable and just.

Respectfully submitted:

Jack N. Zaharopoulos
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036
(717) 566-6097

BY: /s/ Douglas R. Roeder, Esquire
Attorney for Trustee

CERTIFICATE OF SERVICE

AND NOW, this 31st day of March 2025, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first-class mail, addressed to the following:

Gary J. Imblum, Esquire
Imblum Law Offices, P.C.
4615 Derry Street
Harrisburg, PA 17111

/s/ Derek M. Strouphauer, Paralegal
Office of Jack N. Zaharopoulos
Standing Chapter 13 Trustee